

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>JOHNNY POTTS AND JANICE POTTS, PLAINTIFFS,</b>	*
	*
	*
<b>vs.</b>	<b>* CV-06-00124-WHA-CSC</b>
	*
<b>DYNCORP INTERNATIONAL, LLC;</b>	*
<b>DYNCORP INTERNATIONAL, FZ-LLC;</b>	*
<b>JAMES MCCANTS, an individual; DEFENDANTS.</b>	*

**MOTION TO AMEND COMPLAINT**

COME NOW the Plaintiffs, Johnny and Janice Potts, and move this Honorable Court for an order permitting them to amend the Complaint in this matter to add DynCorp International FZ-LLC as a party defendant. This Motion to Amend is timely filed under the Scheduling Order governing this action.

DynCorp International FZ-LLC is the entity listed on James McCants' employment agreement as his employer and is believed to be subsidiary of DynCorp International, LLC. In addition, the Plaintiffs have added a contention in their damages that Mr. Potts' leg has been permanently disfigured as a result of this accident, have deleted references to fictitious parties defendants contained in the original complaint and corrected minor typographical errors contained in the original complaint.

A copy of the proposed Amended Complaint is attached hereto as Exhibit A.

Done this the 15<sup>th</sup> day of September, 2006.

**MORRIS, HAYNES & HORNSBY**

/s Larry W. Morris  
Larry W. Morris, MOR007  
Attorney for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing in the above referenced case on the 15<sup>th</sup> day of September, 2006 by filing the same electronically with the Clerk of the Court using the CM/ECF system which will send notification of the same to all attorneys of record.

/s Larry W. Morris  
Of Counsel